FIRE PREVENTION AND BUILDING SAFETY COMMISSION Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2022-15-2014 IBC-1006.3

Building or Fire Safety Law Interpreted

<u>675 IAC 13-2.6</u> **2014 Indiana Building Code, Section 1006.3 Emergency power for illumination.** The power supply for *means of egress* illumination shall normally be provided by the premises' electrical supply.

In the event of power supply failure, an emergency electrical system shall automatically illuminate all of the following areas:

- 1. Aisles and unenclosed egress stairways in rooms and spaces that require two or more means of egress.
- 2. Corridors, interior exit stairways and ramps, and exit passageways in buildings required to have two or more exits.
- 3. Exterior egress components at other than their levels of exit discharge until exit discharge is accomplished for buildings required to have two or more exits.
- 4. Interior exit discharge elements, as permitted in Section 1027.1, in buildings required to have two or more exits.
- 5. Exterior landings as required by Section 1008.1.6 for exit discharge doorways in buildings required to have two or more exits.

[Additional content omitted for lack of relevance to the request.]

Issue

Whether Section 1006 of the 2014 Indiana Building Code (IBC) requires emergency power to provide egress illumination in all occupied areas of the building.

Interpretation of the State Building Commissioner

No. Section 1006 of the 2014 IBC does not require emergency power to provide egress illumination in all occupied areas of the building.

Rationale

Section 1006 of the 2014 IBC describes the locations and conditions that require illumination of the means of egress. In applying the requirements of the section, care must be taken not to conflate the requirements for means of egress illumination under normal power conditions and the requirements for means of egress illumination under emergency power. **Means of egress lighting is not emergency lighting.** The code provides minimum performance standards for each, separate of the other, within the subsections of 1006.

Section 1006.1 states that the means of egress is required to be illuminated at all times the building space served by that means of egress is occupied. However, Section 1006.3, a subsection of 1006 equally as important as 1006.1, states that "the power supply for the means of egress illumination [referring here to the lighting performance required under 1006.1] shall normally be provided by the premises' electrical supply." In making that statement, Section 1006.3 draws a distinction between means of egress illumination during normal power conditions and means of egress illumination during power failure emergencies.

Section 1006.3 continues to reinforce the difference between the two conditions when it states, "in the event of power supply failure, an emergency electrical system shall automatically illuminate all of the following areas:" after which it provides an enumerated list of the locations and conditions in which the means of egress must be illuminated by the emergency power system. In providing this list of conditions, Section 1006.3 is making two statements:

- That there are no conditions outside of those in the list in which the emergency power system must provide egress illumination of any kind; and
- That in the presence of any of these conditions, it is only that specifically named condition and location where the emergency illumination must be provided.

It is vital to understand that **Section 1006.3** is not in conflict with **Section 1006.1**. It simply delineates conditions under which the general egress lighting requirements of 1006.1 do not apply. In short, there is no general requirement in the code for universal means of egress illumination during power loss emergencies. In conditions of power loss, only the spaces named in 1006.3 are required to have egress illumination from the

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emergency power system.

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